

Hearing Date and Time: June 30, 2009 at 9:45 a.m.

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Committee of Consumer Victims of General Motors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**AMENDED AND SUPPLEMENTAL EVIDENCE AND WITNESS LIST OF THE AD
HOC COMMITTEE OF CONSUMER VICTIMS OF GENERAL MOTORS FOR THE
DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§105, 363(b), (f), (k), and (m), AND 365
AND FED R. BANKR. P. 2002, 6004, AND 6006, TO (I) APPROVE (A) THE SALE
PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT WITH
VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED
PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND
OTHER INTERESTS; (B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF;
AND (II) SCHEDULE SALE APPROVAL HEARING**

The Ad Hoc Committee of Consumer Victims of General Motors (the "Ad Hoc
Consumer Committee"), by and through its undersigned counsel, by way of amended and
supplemental evidence and witness list for the Debtors' Motion Pursuant to 11 U.S.C. §§105,
363(b), (f), (k), and (m), and 365 and Fed R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A)

the Sale Pursuant to the Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear Of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing (the “Sale Motion”), hereby states:

WITNESSES

The Ad Hoc Consumer Committee may call as adverse witnesses Frederick Henderson, CEO of General Motors Corp. (“GM”) and Harry Wilson of the U.S. Auto Task Force, live or by deposition. The Ad Hoc Committee reserves its right to cross-examine witnesses called live or declaration or affidavit by the Debtors or any other party. The Ad Hoc Consumer Committee also reserves its right to amend or supplement this list upon review of discovery responses just now being provided, or otherwise should the need present itself.

EXHIBITS

EXHIBIT	TITLE
1	April 7, 2009 Letter from B. Bressler to H. Miller
2	April 9, 2009 Letter from H. Miller to B. Bressler
3	Cadwalader ,Wickersham & Taft, LLP Memorandum – “Use of Section 363 to Expedite Restructuring of Distressed OEMS” (GMPR000092336)
4	April 2, 2009 Cadwalader, Wickersham & Taft, LLP Memorandum (TREAS_IUE-CWA 00003013)
5	May 2, 2009 Email from J. Damour to Harry Wilson and Matthew Feldman (TREAS_IUE-CWA 00000431)

6	May 7, 2009 General Motors Contingency Planning 363 Analysis (GMPR 000195198)
7	May 9, 2009 General Motors 363 Preparation Update (GMPR 000169628)
8	May 18, 2009 GM/UAW/UST VEBA Discussion (TREAS_IUE-CWA 00002609)
9	June 3, 2009 Matthew Feldman Email (TREAS_CLA 00004749)
10	June 3, 2009 L. Buonomo Email (TREAS_CLA 00004740)
11	June 8, 2009 M. Gruskin Email (TREAS_CLA 00004735)
12	June 8, 2009 M. Feldman Email (TREAS_CLA 00004744)
13	June 25, 2009 Letter from Senator Harry Reid and Senator Richard J. Durbin to Steven Rattner

The Ad Hoc Consumer Committee may also use the Affidavits or Declarations, as supplemented and amended, of Frederick Henderson, Albert Koch, William C. Repko, Harry Wilson, J. Stephen Worth, and any amendments, supplements or exhibits thereto, the Master Transaction Agreement and any of the documents contained on the Debtors' exhibit list at the hearing on the Sale Motion.

DEPOSITION DESIGNATIONS

The depositions of Michael Raleigh of GM, Frederick Henderson of GM and Harry Wilson of the U.S. Auto Task Force were conducted on June 27, 28 and 29, respectively. The Ad Hoc Committee reserves the right to designate all or portions of the transcripts of such depositions.

SCHNADER HARRISON SEGAL
& LEWIS LLP

Dated: June 29, 2009

By: /s/ Benjamin P. Deutsch

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